

Broderick, J

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

SONTERRA CAPITAL MASTER FUND, LTD., on
behalf of itself and all others similarly situated,

Plaintiff,

- against -

BARCLAYS BANK PLC, COÖPERATIEVE
CENTRALE RAIFFEISEN-BOERENLEENBANK
B.A., DEUTSCHE BANK AG, LLOYDS BANKING
GROUP PLC, THE ROYAL BANK OF SCOTLAND
PLC, UBS AG, AND JOHN DOE NOS. 1-50,

Defendants.

Docket No. 15-cv-3538 (VSB)

STIPULATION AND ~~PROPOSED~~ SCHEDULING ORDER

Plaintiff Sonterra Capital Master Fund, Ltd. ("Plaintiff"), and Defendants Barclays Bank plc, Coöperatieve Centrale Raiffeisen-Boerenleenbank B.A., Deutsche Bank AG, Lloyds Banking Group plc, The Royal Bank of Scotland plc, and UBS AG (collectively, "Defendants"), by and through their respective undersigned counsel, subject to this Court's approval, agree and stipulate as follows:

RECITALS

WHEREAS, on May 6, 2015, Plaintiff commenced the above-captioned action by the filing of a Summons and Complaint ("Complaint") against Defendants;

WHEREAS, Defendants have agreed to accept service of the Complaint;

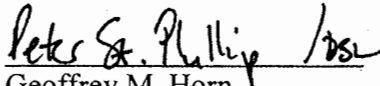
WHEREAS, Plaintiff and Defendants have agreed to the below schedule for the time for Plaintiff to file an Amended Complaint and for Defendants to answer, move to dismiss, or otherwise respond to the Amended Complaint;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED as follows:

1. Plaintiff shall file an Amended Complaint on or before July 24, 2015.
2. Defendants shall answer, or otherwise respond to the Amended Complaint on or before September 25, 2015.
3. If Defendants move to dismiss the Amended Complaint, Plaintiff shall respond on or before November 20, 2015, and Defendants may file their replies on or before December 21, 2015.
4. Discovery is stayed pending resolution of Defendants' motion(s) to dismiss; except that if any Defendant moves to dismiss the Amended Complaint on the ground that this Court lacks personal jurisdiction as to it pursuant to FED. R. CIV. P. 12(b)(2), Plaintiff may seek leave of Court to conduct jurisdictional discovery and additional time to file its opposition(s) to the FED. R. CIV. P. 12(b)(2) motion(s) to dismiss in order to conduct such discovery. Defendants reserve the right to oppose any motion by Plaintiff seeking leave of Court to conduct jurisdictional discovery.
5. Except as to the defense of insufficient service of process, no defense of Defendants, including without limitation defenses based upon lack of personal jurisdiction, is prejudiced or waived by Defendants' executing, agreeing to, or filing this Stipulation.
6. This Stipulation may be executed in separate counterparts, and counterparts may be executed by e-mail or facsimile, each of which shall be an original.

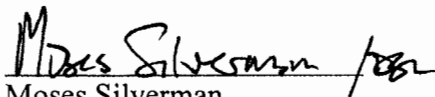
Dated: New York, New York
May 22, 2015

RESPECTFULLY SUBMITTED,



Geoffrey M. Horn
Vincent Briganti
Peter St. Phillip
Raymond Girnys
Christian P. Levis
Michelle E. Conston
LOWEY DANNENBERG COHEN & HART,
P.C.
One North Broadway
White Plains, NY 10601
Tel: (914) 997-0500
Fax: (914) 997-0035
Email: ghorn@lowey.com
vbriganti@lowey.com
pstphilip@lowey.com
rgirnys@lowey.com
clevis@lowey.com
mconston@lowey.com

*Attorneys for Plaintiff Sonterra Capital Master
Fund, Ltd.*



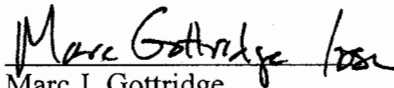
Moses Silverman
Andrew C. Finch
Jessica Brach
Noam Lerer
PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP
1285 Avenue of the Americas
New York, New York 10019
Telephone: (212) 373-3355
Fax: (212) 492-0355
msilverman@paulweiss.com
afinch@paulweiss.com
jbrach@paulweiss.com
nlerer@paulweiss.com

Attorneys for Defendant Deutsche Bank AG



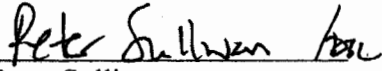
Fraser L. Hunter, Jr.
David S. Lesser
Jamie S. Dycus
WILMER CUTLER PICKERING
HALE AND DORR LLP
250 Greenwich Street
New York, New York 10007
Telephone: (212) 230-8800
Fax: (212) 230-8888
fraser.hunter@wilmerhale.com
david.lesser@wilmerhale.com
Jamie.dycus@wilmerhale.com

*Attorneys for Defendant The Royal Bank of
Scotland plc*



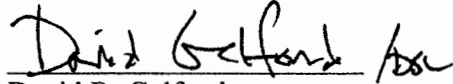
Marc J. Gottridge
Lisa J. Fried
HOGAN LOVELLS US LLP
875 Third Avenue
New York, New York 10022
Telephone: (212) 918-3000
marc.gottridge@hoganlovells.com
lisa.fried@hoganlovells.com

*Attorneys for Defendant Lloyds Banking
Group plc*



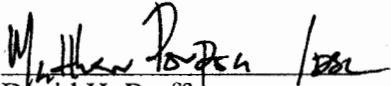
Peter Sullivan
Lawrence J. Zweifach
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, New York 10166-0193
Telephone: (212) 351-4000
psullivan@gibsondunn.com
lzweifach@gibsondunn.com

Attorneys for Defendant UBS AG



David R. Gelfand
Sean M. Murphy
MILBANK TWEED HADLEY &
McCLOY LLP
One Chase Manhattan Plaza
New York, New York 10005
Telephone: (212) 530-5000
dgelfand@milbank.com
smurphy@milbank.com

*Attorneys for Defendant Coöperatieve
Centrale Raiffeisen-Boerenleenbank B.A.*



David H. Braff
Yvonne S. Quinn
Jeffrey T. Scott
Matthew J. Porpora
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004
Telephone: (212) 558-4000
braffd@sullcrom.com
quinny@sullcrom.com
scottj@sullcrom.com
porporam@sullcrom.com

Jonathan D. Schiller
Leigh M. Nathanson
BOIES, SCHILLER & FLEXNER LLP
575 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-2300
jschiller@bsflfp.com
lnathanson@bsflfp.com

Michael A. Brille
5301 Wisconsin Avenue NW
Washington, D.C. 20015
Telephone: (202) 237-2727
mbrille@bsflfp.com

Attorneys for Defendant Barclays Bank plc

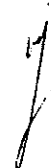
SO ORDERED

Dated: New York, New York
May 26

May 26, 2015

A handwritten signature in black ink, reading "Vernon Broderick". The signature is written in a cursive style with a large initial "V".

Vernon S. Broderick
United States District Judge

A handwritten mark in black ink, resembling a stylized letter "J" or the number "7". It is located to the right of the judge's name.